

**REMARKS**

Claims 1-11, 13-18 and 22 are pending in the application. By this Amendment, Applicant adds new claims 21 and 22, which are fully supported in the original disclosure.

Claims 1-11, 13-18 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. 2003/0126293 to Bushey in view of U.S. Patent Application No. 2005/0267935 to Ghandi et al. Applicant submits the following in traversal.

**Rejection of claims 1-11, 13-18 and 20 under § 103(a)**

Applicants respectfully submits that claim 1 is patentable over Bushey in view of Ghandi because a *prima facie* case of obviousness has not been established.

First, Applicant submits that Bushey and Ghandi fail to disclose or suggest, *inter alia*:

a gateway where an integrated user interface is generated based on mutual user interfaces or devices residing on a home network and converted into a specific user interface suitable for a specific client of a user,

wherein the gateway requests a control device to transmit a mutual user interface selected by the user from the integrated user interface.

In the Office Action, the Examiner alleges that the appliance manager 100 of Bushey corresponds to the claimed gateway. Specifically, the Examiner recites paragraph [0014] as allegedly disclosing the afore-mentioned claim recitations.

The paragraph cited by the Examiner, however, describes the appliance manager 100 that is included in the local appliance 10. Bushey describes that the “local appliance 10 preferably retrieves all of the capabilities and interface settings of each of remote appliances 12-14.

Additionally, local appliance 10 preferably provides information on its different capabilities to each of the remote appliances 12-14.” Paragraph [0014]. The “interface” disclosed in Bushey, however, does not relate to any sort of the user interface. Rather, Bushey discloses in paragraph [0015], that the interface relates to “information as [to] what data formats remote appliances 12-14 support, what resolutions each supports, what colors each supports, what video formats each supports, and so on.” These pieces of information do not disclose nor suggest any sort of user interface. Therefore, the Examiner cannot argue that the appliance manager of Bushey corresponds to the claimed gateway.

Second, Bushey and Ghandi fail to disclose or suggest “the gateway [ing] a control device to transmit a neutral user interface selected by the user from the integrated user interface, said user selecting said neutral user interface” in combination with other elements of claim 1. In the Office Action, the Examiner alleges that paragraph [0006] discloses the afore-mentioned claim recitations. Paragraph [0006], however, does not mention a user selecting any sort of a user interface. Rather, the paragraph merely discloses the aforementioned interface information regarding appliances and a network interface for communicating multi-media data, and some additional description not relevant to the claim.

Third, Applicant submits that one skilled in the art would not modify the interface information of Bushey with the user interface of Ghandi. In the Office Action, the Examiner concedes that Bushey fails to disclose “wherein the user controls operation of the device using the device specific user interface,” and alleges that Ghandi discloses a user interface. As explained above, the interface information of Bushey do not relate to any user interface, but rather, relates to particular operating or display features supported by a remote appliance. If one were to modify the interface information so that some sort of a user interface is presented to a

user, then there would be no reasonable expectation of success in such a combination. See MPEP § 2143.02. By replacing the interface information with some sort of a user interface, Bushey's system would not be able to convert multi-media data of one format to another format that is compatible with another appliance.

Further, having a user interface in lieu of interface information would defeat the purpose of Bushey to translate the multi-media data into a compatible format since the interface information will not exist.

In view of the above, Applicant respectfully submits that a *prima facie* case of obviousness has not been established and that claim 1 is patentable.

Claims 2-5, which depend from claim 1, are patentable for at least the reasons submitted for claim 1.

Claims 6, 7, 10, 14, 17 are patentable for reasons similar to those submitted for claim 1.

In addition, Applicant submits that claim 10 is further patentable because Ghandi fails to disclose or suggest said user selecting said neutral user interface corresponding to a device which the user desires to control among the devices residing on the home network, in combination with other elements of the claim. Rather, the paragraphs of Ghandi cited by the Examiner, paragraphs [0129-0130] merely mention:

**[0129]** Controlled Devices **106-107** are responsible for storing the state of Services. User Control Points are required to synchronize to the state on Controlled Devices and to share state directly among themselves.

**[0130]** User Control Points typically have user interface that is used to access one or more Controlled Devices on the network. Controlled Devices only have local user interfaces.

As shown above, Ghandi fails to disclose or suggest the user selecting said neutral user interface, as recited in claim 10.

For reasons similar to those presented for claim 10, claim 17 is also additionally patentable.

Claims 8, 9, 11, 13, 15, 16, 18, and 20, which depend from claims 7, 10, 14, or 17, are patentable for at least the reasons submitted for their respective independent base claims.

To further claim the invention, Applicant adds new dependent claims 21 and 22, which are fully supported in the original disclosure and patentable for the reasons submitted for base claim 1.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,  
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